

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW
Peter A. Schey (Cal. Bar No. 58232)
Carlos Holguín (Cal. Bar No. 90754)
256 South Occidental Boulevard
Los Angeles, CA 90057
Telephone: (213) 388-8693
Facsimile: (213) 386-9484
Email: pschey@centerforhumanrights.org
crholguin@centerforhumanrights.org

ORRICK, HERRINGTON & SUTCLIFFE LLP
Elena Garcia (Cal. Bar No. 299680)
egarcia@orrick.com
777 South Figueroa Street, Suite 3200
Los Angeles, CA 90017
Telephone: (213) 629-2020

Attorneys for plaintiffs (listing continues on following page)

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JENNY LISETTE FLORES, <i>et al.</i> ,)	Case CV 85-4544 DMG-AGRx
)	
Plaintiffs,)	EXHIBITS IN SUPPORT OF
)	PLAINTIFFS’MOTION TO
- vs -)	ENFORCE THE SETTLEMENT
)	AGREEMENT[REDACTED
WILLIAM BARR, ATTORNEY)	VERSION OF DOCUMENT
GENERAL)	PROPOSED TO BE FILED
OF THE UNITED STATES, <i>et al.</i> ,)	UNDER SEAL] VOL. 3 OF 5
)	
Defendants.)	[HON. DOLLY M. GEE]

///

1 *Plaintiffs' counsel, continued:*

2 LA RAZA CENTRO LEGAL, INC.
3 Michael S. Sorgen (Cal. Bar No. 43107)
4 474 Valencia Street, #295
5 San Francisco, CA 94103
6 Telephone: (415) 575-3500

7 THE LAW FOUNDATION OF SILICON VALLEY
8 LEGAL ADVOCATES FOR CHILDREN AND YOUTH
9 Jennifer Kelleher Cloyd (Cal. Bar No. 197348)
10 Katherine H. Manning (Cal. Bar No. 229233)
11 Annette Kirkham (Cal. Bar No. 217958)
12 4 North Second Street, Suite 1300
13 San Jose, CA 95113
14 Telephone: (408) 280-2437
15 Facsimile: (408) 288-8850
16 Email: jenniferk@lawfoundation.org
17 kate.manning@lawfoundation.org
18 annettek@lawfoundation.org

19 NATIONAL CENTER FOR YOUTH LAW
20 Leecia Welch (Cal. Bar No. 208741)
21 Neha Desai (Cal. RLSA Bar No. 803161)
22 405 14th Street, 15th Floor
23 Oakland, CA 94612
24 Telephone: (510) 835-8098
25 Email: lwelch@youthlaw.org
26 ndesai@youthlaw.org

27 U.C. DAVIS SCHOOL OF LAW
28 Holly S. Cooper (Cal. Bar No. 197626)
One Shields Ave. TB 30
Davis, CA 95616
Telephone: (530) 754-4833
Email: hskooper@ucdavis.edu

PLAINTIFFS' MOTION TO ENFORCE CV 85-4544-DMG(AGRX)

1 *Of counsel:*

2 YOUTH LAW CENTER
3 Virginia Corrigan (Cal. Bar No. 292035)
4 832 Folsom Street, Suite 700
5 San Francisco, CA 94104
6 Telephone: (415) 543-3379
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

28 PLAINTIFFS' MOTION TO ENFORCE CV 85-4544-DMG(AGRX)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

INDEX OF EXHIBITS

VOL. 1

1. Declaration of Peter Schey	1
2. Declaration of Hope Frye	8
3. Excerpts of Flores Class Member Declarations	15
4. Office of Refugee Resettlement Unaccompanied Minors Policies	43
5. N.E. Wang, Emergency Medicine and Pediatrics at Stanford, Stanford Human Rights in Trauma Mental Health Program, <i>2018 Individual Program Report: Homestead</i> (April 11, 2019)	52
6. Declaration of Dr. Marsha Griffin	67
7. Declaration of Dr. Ryan Matlow	84
8. The New England Journal of Medicine, Reducing Protections for Noncitizen Children — Exacerbating Harm and Trauma (November 21, 2018)	104
9. Omitted	

VOL. 2

10. Deposition of K [REDACTED], ORR Federal Field Specialist, <i>Lucas R v. Azar</i>	108
---	-----

VOL. 3

11. Declaration of E [REDACTED] L [REDACTED]	337
12. Declaration of J [REDACTED] Q [REDACTED]	341
13. Declaration of M [REDACTED] D [REDACTED]	346
14. Declaration of Y [REDACTED] M [REDACTED]	351
15. Declaration of C [REDACTED] M [REDACTED]	355
16. Declaration of C [REDACTED] A [REDACTED]	359
17. Declaration of D [REDACTED] O [REDACTED]	363
18. Declaration of E [REDACTED] G [REDACTED]	366

1	19.Declaration of H [REDACTED] Z [REDACTED]	369
2	20.Declaration of J [REDACTED] M [REDACTED]	373
3	21.Declaration of J [REDACTED] A [REDACTED]	377
4	22.Declaration of K [REDACTED] M [REDACTED]	380
5	23.Declaration of K [REDACTED] D [REDACTED]	384
6	24.Declaration of M [REDACTED] G [REDACTED]	388
7	25.Declaration of M [REDACTED] Y [REDACTED]	392
8	26.Declaration of M [REDACTED] A [REDACTED]	395
9	27.Declaration of M [REDACTED] G [REDACTED]	398
10	28.Declaration of N [REDACTED] G [REDACTED]	401
11	29.Declaration of N [REDACTED] J [REDACTED]	404
12	30.Declaration of D [REDACTED] A [REDACTED]	408
13	31.Declaration of O [REDACTED] D [REDACTED]	412
14	32.Declaration of S [REDACTED] D [REDACTED]	415
15	33.Declaration of S [REDACTED] G [REDACTED]	418
16	34.Declaration of C [REDACTED] A [REDACTED]	422
17	<u>VOL. 4</u>	
18	35.Declaration of D [REDACTED] L [REDACTED]	426
19	36.Declaration of E [REDACTED] A [REDACTED]	430
20	37.Declaration of E [REDACTED] Y [REDACTED]	433
21	38.Declaration of Y [REDACTED] M [REDACTED]	437
22	39.Declaration of G [REDACTED] M [REDACTED]	440
23	40.Declaration of M [REDACTED] J [REDACTED]	444
24	41.Declaration of N [REDACTED] R [REDACTED]	448
25	42.Declaration of M [REDACTED] Y [REDACTED]	453
26	43.Declaration of N [REDACTED] C [REDACTED]	457
27	44.Declaration of O [REDACTED] D [REDACTED]	461
28	45.Declaration of Y [REDACTED] A [REDACTED]	465

1	46.Declaration of M [REDACTED] A [REDACTED]	469
2	47.Declaration of A [REDACTED] H [REDACTED]	473
3	48.Declaration of J [REDACTED] N [REDACTED]	476
4	49.Declaration of H [REDACTED] S [REDACTED]	479
5	50.Declaration of E [REDACTED] I [REDACTED]	485
6	51.Declaration of G [REDACTED] N [REDACTED]	489
7	52.Declaration of D [REDACTED] A [REDACTED]	492
8	53.Declaration of S [REDACTED] N [REDACTED]	496
9	54.Declaration of D [REDACTED] J [REDACTED]	500
10	55.Declaration of H [REDACTED] M [REDACTED]	505
11	56.Declaration of B [REDACTED] M [REDACTED]	509
12	57.Declaration of C [REDACTED] G [REDACTED]	513
13	58.Declaration of N [REDACTED] P [REDACTED]	517
14	59.Declaration of D [REDACTED] H [REDACTED]	521
15	<u>VOL. 5</u>	
16	60.Declaration of E [REDACTED] G [REDACTED]	525
17	61.Declaration of A [REDACTED] A [REDACTED]	529
18	62.Declaration of A [REDACTED] B [REDACTED]	532
19	63.Declaration of L [REDACTED] M [REDACTED]	536
20	64.Declaration of N [REDACTED] E [REDACTED]	539
21	65.Declaration of J [REDACTED] A [REDACTED]	543
22	66.Declaration of J [REDACTED] D [REDACTED]	547
23	67.Declaration of J [REDACTED] P [REDACTED]	550
24	68.Declaration of I [REDACTED] P [REDACTED]	553
25	69.Declaration of J [REDACTED] J [REDACTED]	557
26	70.Declaration of E [REDACTED] J [REDACTED]	560
27	71.Declaration of K [REDACTED] D [REDACTED]	564
28	72.Declaration of J [REDACTED] N [REDACTED]	567

1	73.Declaration of R [REDACTED] A [REDACTED]	571
2	74.Declaration of E [REDACTED] E [REDACTED]	575
3	75.Declaration of R [REDACTED] F [REDACTED]	578
4	76.Declaration of M [REDACTED] N [REDACTED]	581
5	77.Declaration of M [REDACTED] U [REDACTED]	585
6	78.Declaration of A [REDACTED] E [REDACTED]	589
7	79.Declaration of D [REDACTED] N [REDACTED]	593
8	80.Declaration of Z [REDACTED] P [REDACTED]	598
9	81.Declaration of C [REDACTED] A [REDACTED]	602
10	82.Declaration of M [REDACTED] I [REDACTED]	606
11	83.Declaration of H [REDACTED] P [REDACTED]	609
12	84.Declaration of A [REDACTED] S [REDACTED]	612
13	85.Declaration of A [REDACTED] Q [REDACTED]	616
14	86.Declaration of K [REDACTED] M [REDACTED]	620

15 ///

Exhibit 11

Declaration of

E[REDACTED] L[REDACTED] A# [REDACTED]

I, E[REDACTED] L[REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am a native of Huehuetenango, Municipality of Cuilco, Guatemala. I lived with both my father [REDACTED] and mother [REDACTED] in Guatemala. My first language is the Mam language. I also speak Spanish as a second language and understand about 80 % of it.
2. I left Guatemala on April 16th, 2018. I came to the United States with my father. We traveled for about eight days with a group of about fifty people, and crossed the border into Arizona, United States on about April 24th, 2018. As we started walking on the road in the evening, we were immediately apprehended by Border Patrol and took us to the station.
3. Once we arrived to the station, I was immediately separated from my father, not even permitted to hug my father goodbye. I was put in a room with other girls. Later than night, I was interviewed alone by the guards, and they took my finger prints. Then they asked me to sign a document that was read to me in Spanish. I was also told that my father was going to be deported right away to Guatemala and I was going to be sent to a special home for children. I asked if I could say goodbye to my father and they said no because they were transferring me immediately to the new home.
4. A few hours later, at about 3 in the morning, I was taken to the airport with seven other children and we traveled by air to an unknown location. Then we landed at another airport and two additional children were put on the same plane as me. We traveled another three hours and landed in Miami, FL at about midnight.
5. I was then transported to the Miami detention center and processed. I was given a medical check, they checked for lice on my head, they fed me, they gave me new clothing and shoes, and hygiene products to clean myself. I was then allowed to shower and went to sleep.
6. The next morning, they gave me some vaccine shots and was later taken to see my social worker to be interviewed. I asked if I could speak to my father but they couldn't connect me as they didn't know his whereabouts; however, I was able to call my mother in Guatemala and speak to her for about ten minutes.
7. At the interview with my social worker and counselor, I was asked if I had any family members in the United States and I told them that I had an aunt-[REDACTED] in Florida. A whole month went by

and I was finally able to speak to my aunt [REDACTED] who said she would help me and that she would take care of me. When my aunt [REDACTED] spoke to my social worker, she was told by the social worker that since I did not know my aunt in person, they couldn't release me to her because she was not blood-related. My aunt [REDACTED] was married to mother's brother and was a widow.

8. I was then asked by my social worker if I had any other family members in the United States and I told them about my aunt A [REDACTED] also married to another of my mother's brothers who is now deceased. My aunt A [REDACTED] lives in South Carolina. My aunt A [REDACTED] was also told she could not care for me because we are not blood-related.
9. My mother and my father are both in agreement that I live with my aunt A [REDACTED] as I personally know her from Guatemala. My aunt A [REDACTED] has been trying to get the government to send me to her care but the social worker said I cannot be sent to her home because my aunt A [REDACTED] lives with three of her children and there is no space for me.
10. My father recently tried to get a new sponsor for me but I don't have the details yet so I don't know what is going to happen to me. I am really desperate. I have been here for over three months and still don't know what is going to happen to me. My social worker and counselor have neither provided me with current information regarding my situation and when will I be released.
11. At the current facility where I live I am properly fed and clothed and have no issues or concerns. I am permitted to speak to my parents on the phone for about 10 minutes; sometimes less. However, I am very sad and feel very bad. I feel very lonely and constantly cry. I have nightmares that wake me up and have frequent panic attacks. Since I have been here in Miami, I have had at least six panic attacks. It is also very hard to see other children leave the center and I am still here with no way to get out.

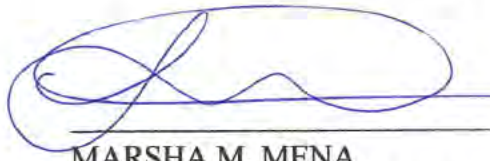
I, E [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
E [REDACTED]

7/31/18
Date

Certificate of Translation

I, Marsha M. Mena, certify that I am fluent in English and Spanish and that I read the above declaration to E [REDACTED] in Spanish. Executed this 31st of July, 2018, in Miami, Florida.



Date: 7/31/2018

MARSHA M. MENA
HISPANIC FAMILY COUNSELING, INC.
6900 S. Orange Blossom Tr.
Orlando, FL 32809

Exhibit 12

**Declaration of J. [REDACTED] O. [REDACTED]
A NUMBER [REDACTED]**

I, J. [REDACTED] Q. [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth [REDACTED] I am from Guatemala.
2. I am from a very rural place called Centro Aguacatilla in the Department of San Luis Peten. My first language is Que'qchi and I am just starting to learn how to understand and speak Spanish. I came here because I wanted to get to study. I wanted to go to school in Guatemala but the nearest school was two hours away and I had to walk on foot. I studied for three months but then I couldn't handle walking so far anymore. I would like to study in the U.S. I am also afraid that I will owe a lot of money if I return. We borrowed money for my travel and I want to stay here so I can pay the money back. I don't know what will happen if we cannot pay that money back.
3. I crossed the U.S.-Mexico border on foot with my father, [REDACTED] on May 25th, 2018. We were apprehended by Border Patrol immediately. I'm not sure where we were in the U.S. when we crossed the border. After we were detained, I was separated from my father. I have not seen him since then.
4. After we were detained, I was held in a tent for five days with many other young people. We were not allowed to leave the tents at all for the entire time that we stayed there - we were locked inside and could not go outside at all. We slept on mattresses on the floor. It was cold. I got a cold while I was there, and there was no one I could talk to for medical attention. Then I was told I would be sent somewhere else. I said I wanted to be with my father, but the immigration officials did not let me be with him or see him at all. They put me on an airplane and sent me to this facility - Homestead, in Florida. I was very disoriented because we flew in on the plane at night.
5. I have been at the Homestead Detention Facility since May 30th, 2018. Most of the other girls in my dormitory speak many indigenous languages from different parts of Guatemala. Some of the girls here have fainting episodes when they hear the emergency sirens go off. I get about five minutes to shower in the morning. The staff have us get up, shower, and then go back to bed. At 9am we are called to get up and eat, and then we are sent to go to school in a group of 36 at 10am. We practice speaking and writing in English, and then we go to lunch. Afterwards, we return to school and study history and math. I'm part of a smaller group that is also studying dance. At 5pm, school ends. Then we have dinner and go to our rooms. We clean our rooms, pray, and residents talk to each other. I spend a lot of time praying each evening to ask God to make sure things turn out well, and asking that I am able to leave here and go to be with my uncle. I really miss my family and I want to be with them. I really want to leave here.
6. I have an uncle who lives in New Jersey. His name is [REDACTED] and he is my father's oldest brother. He has lived in the U.S. since I was 5 years old. My uncle has also said he would like me to come live with him. I would like to go and live with him, and he would like me to live with him. I have

spoken with him several times by phone since arriving in Homestead, and he says that he would like me to live with him. I would like to live with him and with his daughter, my cousin, and with my uncle's wife. My father was deported back to Guatemala, so I have spoken with my mother and my father since being sent to Homestead. I have told my parents that I would like to live with my uncle [REDACTED] and my parents support that plan. I have told my social worker that I want to live with my uncle [REDACTED] and my social worker told me to be patient. He said that we are waiting for my birth certificate to arrive from Guatemala. I did not bring any identity documents with me. My social worker told me that my parents have sent my birth certificate, and that they are sending the certificate to the state so the state can check it. I also have trouble understanding my social worker because he speaks Spanish and I am still learning Spanish, so it's hard to understand her. No one has explained other options for leaving this facility. They just tell me to be patient. I don't know anyone here who has gotten to leave and be with their family. I feel sad because I want to go and be with my family.

7. The Homestead facility is very secure. We are not allowed to go off grounds except with special permission and we must ask in advance. I have not gotten to leave at all. The people in charge have said that if you leave without permission, they will file a report against us. The doors are always locked. We also have "YCs" – that's what they're called. They accompany us for meals and tell us what we can do. They change throughout the day. We can't even go to the bathroom without a YC accompanying us.
8. I don't have a lawyer. I've never been given a list of lawyers. Staff here told me there are no lawyers in Homestead.
9. I don't know whether the government has gotten permission from my parents to transfer me to Homestead. I also don't know if the government has gotten permission from my parents for anything. I was given medicine when I arrived in Homestead and I don't know if my parents gave permission for that. My parents have never mentioned anything about being asked permission by the government when I spoke to them briefly by phone.
10. We are only allowed to talk on the phone for ten minutes at a time, twice a week. My social worker told me that rule. I have to go to see my counselor to use the phone. Sometimes, I use my ten minutes to talk to my father. Other times, I use five minutes to talk to my uncle [REDACTED] and five minutes to call my parents. Calls are free. I wish I had much more time to talk to my parents. I miss them very much and I wish I could talk to them about my life here. I also wish I had more time to talk to them about my plans to live with my uncle Cesario, and to better understand what's happening. I would like to know whether I am going to get to live with my uncle soon, but there's not enough time to communicate.

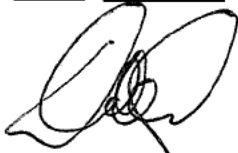
I, J [REDACTED] Q [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language that I am able to understand, and was read back to me in Spanish.

7/31/2018

7/31/2018

#27054
Certificate of Translation

I, Denisse Centeno Lamas, certify that I am fluent in English and Spanish and that I read the above declaration to J [REDACTED] Q [REDACTED] in Spanish. Executed this 31 of July, 2018 in Homestead, Florida.



7 - 31 - 18

Denisse Centeno Lamas
Hispanic Family Counseling
6900 S. Orange Blossom Trail, Suite 402
Orlando Florida, 32809

Exhibit 13

Declaration of

M [REDACTED] D [REDACTED] A# [REDACTED]

I, M [REDACTED] D [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Masaguara Intibuca, Honduras. I was raised by my father [REDACTED] I have no relationship with my mother.
2. My Father and I left Honduras sometime in early May of this year to escape men in my town who wanted to take me with them to be their woman; they were constantly harassing us and making threats to my father that they were going to take me by force. They told my father that if he didn't agree to turn me in to them, they will Kill us. They wanted to make me their woman and slave. My father and I were very fearful for our lives so we had no choice than to escape our hometown.
3. I had a friend L [REDACTED] who was 14 years old just like me. L [REDACTED] was also threatened a few months ago; her father had also been threatened that they were going to kill L [REDACTED] and him if she did not agree to be their woman; so L [REDACTED] turned herself in to save her father's life. She was taken by these men for about two months and then released. They abused her sexually and physically. L [REDACTED] returned home and was very depressed- she wanted to die. L [REDACTED] would say she was not the same any more after she was taken and sexually abused by these men. Shortly after L [REDACTED] kidnapping, my father made the decision that we need to flee Honduras for safety as we knew that the local authorities wouldn't do anything for us.
4. After leaving Honduras, we crossed through Guatemala and Mexico and finally made it to the U.S. border in Texas. I recall that we crossed the border in Texas at the end of may 2018. We crossed a river into the United States of America and walked for about 10 minutes. Soon after, we saw a truck approached us. It was border patrol. I was apprehended with my father [REDACTED] and about 6 other people. The guards signaled to us to get on the back of the truck and we were taken to the border patrol station. Once at the station, I was separated from my father in different cells but we could see each other from far. I was given a cookie and a drink by the border patrol guard. We were there for about 10 hours and then taken to another detention center- on the way there, I was reunited momentarily with my father as we traveled to the other center that we were being transferred to.
5. We traveled by vehicle for about 10 minutes. Once we arrive to the other detention center, we were split again- I was put on a big cell with other children and my father was put on a separate cell with other men. Before that, we were inspected once again for medical issues, and they permitted me to shower. This was the only shower I took there for the time I spent at that center. I was also given temporary

clothing and my old clothing was taken to be laundered. I was fed and given an aluminum blanket. Aside from a towel to shower and the blanket, I was not given anything else. I was then provided with a mat and told to go to rest on the floor.

6. I remember that I spent between 3-5 days there at this center. It was hard to remember with precision because everything seemed like one long night. I couldn't tell if it was day or night unless the guards opened the door and I could see the daylight. Once I was at this place, I was not able to speak to my father again or spend any time with him. I could see him from far as I would be picking up my food. My father would wave his hand from a distance, however we were not permitted to be together at any time.
7. I remember that I was with at least 200 other children from ages 5 and up in the same giant cell. Many children were constantly crying. I tried calming them down on many occasions, as many of the young children were crying inconsolably. Some of the kids even slept close to me, as they were very afraid and very cold. Many kids also cried of hunger.
8. On, or around June 2nd, I was told during the night that I was going to be transferred to a group home where a guard stated that I was going to be better. I asked if I could say bye to my father before I left, and they told me I couldn't do it. A few hours later, I was told to stand up and stand in line, and was given a new pair of shoes and told to get in a van. We were six children in total who were being transferred. I tried asking more information as to the whereabouts of my father but was told by a male guard not to worry that my father would eventually reunite with me.
9. After this facility, I was sent to my current facility in Miami, FL. I have been here for about 58 days. Conditions at this location have been good; I have been fed enough, have been given warm clothing and I have received support from a counselor and a social worker.
10. About three days after having arrived to Miami, I was permitted to call a family member- [REDACTED] whose telephone number I had memorized. I asked him about my father, however he had no information about my father. Three days later, I was able to call my cousin [REDACTED] again, and he informed me that my father had been deported back to Honduras. I asked my cousin to get in touch with my father, and provide me with a phone number the next time I was given the opportunity to call, so I could get in touch with him.
11. Before speaking to my father, my counselor asked me if I had any family members who could care for me. My cousin [REDACTED] wanted to help me but he was asked for passport and other documents that he didn't have, so he was told he couldn't take me in. So, [REDACTED] said that another cousin [REDACTED] could take care of me and that they were going to speak to my father about it.

12. It took a few days for my cousin [REDACTED] to get my father's number and I was finally able to contact him. My father gave me permission to go to my cousin [REDACTED] home in Dover, New Jersey, since I did not want to return to my hometown in Honduras, due to fear for my life.
13. My counselor told me that I had a few options for my current situation- that I could be returned to Honduras to rejoin my father, or that I could be sent to the home of family members. I told her that I wanted to go to my cousin [REDACTED] home in New Jersey.
14. Since then, my cousin [REDACTED] has been trying to get the government to release me to him. I was told by my case worker that the delay in my release has been due to the fact that my cousin [REDACTED] lives by himself and they can't release me to him alone so [REDACTED] needs my Aunt [REDACTED] (my father's sister) to move in with him so they can release me to both of them. My understanding is that they are preparing all of the documentation so I could be released to them.
15. I recall that last week I was given a presentation by a person at the center while I was attending my educational classes. Two counselors came to speak to the whole group of girls about a case called Flores and they indicated that if we wanted to speak to an attorney, we needed to sign up right away.
16. This facility is secured and I cannot freely walk without been escorted by an adult person. All children are put into groups of 12 children.
17. My father has spoken to my counselor and social worker and has confirmed that he is in agreement with letting me be released to him.
18. Since I have been at the Miami center, I have talked to father twice per week for about 4 minutes each time and the remaining 6 minutes- I use it to call my cousin and my aunt to find out what is going on with my case. I am sad that there has not been any progress on my case- it seems like is not moving forward. I want to leave this place as soon as possible.
19. To this day, I have no idea when I will be released to the care of my cousin [REDACTED] and my aunt [REDACTED] in New Jersey.

I, M [REDACTED] D [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

M [REDACTED]
D [REDACTED]

07/31/2018

Date

Certificate of Translation

I, Marsha M. Mena, certify that I am fluent in English and Spanish and that I read the above declaration to M. [REDACTED] D. [REDACTED] in Spanish. Executed this 31st of July, 2018, in Miami, Florida.



MARSHA M. MENA
HISPANIC FAMILY COUNSELING, INC.
6900 S. Orange Blossom Tr.
Orlando, FL 32809

Exhibit 14

Declaration of

Y [REDACTED] M [REDACTED]

I, Y [REDACTED] M [REDACTED] (A # [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. I left my home town of Peten, Guatemala with my father. As a farm worker, it was hard for him to make money. Both of us left in part in order to help out our family financially. My father, [REDACTED] has a sister and brother in Nebraska, and we planned to travel there. But once we crossed the U.S. border, CBP apprehended us immediately (but I don't remember where).
3. Within hours, we were informed that the U.S. Government would separate us. I was scared that I'd never see my father again.
4. For 3 days, CBP had me incarcerated in a cold facility surrounded full of kids living in cages. We were only fed crackers and soup. After three days of being at this place, I was sent by van and plane to the Homestead, FL detention center.
5. I've been at this facility approximately just over 2 months. In that time, I've had communication with my aunt in Nebraska and parents back home in Guatemala. After being captured at the border and being separated from each other, my father arrived back in Guatemala after one month of being detained and separated.
6. I was never informed that I had the right under the Flores Settlement Agreement to be released to my aunt in Nebraska. All I was told in the two months I've been here is that the Government is waiting for my fingerprints. I'm happy being at this detention center, but I miss my parents. I'd like to be released to my aunt because I could study and work.
7. Homestead Detention Facility houses over approximately 1294 kids. There are 770 male youth and 522 females. The facility has a 12 to 1 staff to resident ratio. With these many kids at this facility, the place is managed with strict guidance and security. We get toiletries and clothes to wear (pants, shirts, shorts, socks, underwear).
8. I am not allowed to leave when I want to. While the doors are not locked, there is security all over the facility. I've never been told what would happen if I try and leave the facility, but we are given a verbal list of rules to follow.
9. I do not have a lawyer.

10. To my knowledge, ORR has not sought parental consent for any of my transfers and while here, I've needed medical attention for a cyst growth on my lip. I was given medicine as a follow up, but at no time were my parents asked permission for this medical procedure.
11. Since I've being here, I have talked to my mother and father 8 times and I am only allowed to talk to them on scheduled time twice a week for ten minutes. It is not enough time. I would like to talk to them some more.
12. I have no idea how long I might be here at this facility in Homestead, Florida and no one has given me an update as to my detention situation.

I, Y M [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

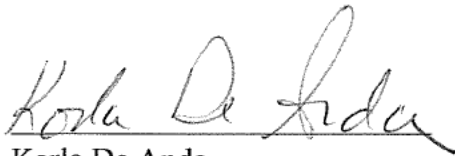
[REDACTED]
Y M [REDACTED]

July 31 2018

July 31, 2018

Certificate of Translation

I, Karla De Anda, certify that I am fluent in English and Spanish and that I read the above declaration to Y [REDACTED]
M [REDACTED] in Spanish. Executed this 31th day of July in Homestead, Florida.



Karla De Anda

Florida Legal Services

122 E. Colonial Drive, Ste. 100

Orlando, Florida 32801

Exhibit 15

Declaration of
C [REDACTED] M [REDACTED] A NUMBER [REDACTED]

I, C [REDACTED] M [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. I was apprehended by Border Patrol with my father, [REDACTED] around June 10th, 2018, shortly after we crossed the U.S.-Mexico border into Texas. We were transported by bus and our documents were taken away and held elsewhere.
3. We were taken to a place that was about 30 minutes away from where we were detained. People who were detained there called this place "the freezer" because it is very cold there. I was separated from my father and placed with other minors. I haven't seen my father since we were separated. I couldn't sleep at night because it was so cold. They gave us silver emergency blankets but we had to sleep on the floor without mattresses. I was not given a change of clothes and was not allowed to shower. They gave us two bottles of juice a day, and burritos for each meal. I was hungry. I felt very bad to be apart from my father. On the first day, there were many other children; the second day just three; and the final day, I was alone. I felt sad being by myself. I missed my father.
4. After three days, I was driven three hours to a large cage inside a tent. I was held in the cage for two days. There were different cages for adults and for youth, and different cages for women and men. I was held there for two days. On the second day, at 6pm, they took a group of young people to the airport and told us they were taking us to Miami, Florida. I was worried because I didn't have my dad with me.
5. I arrived here at the Homestead detention center on June 16th. I have been at Homestead for 46 days. When I arrived, they gave us nine vaccines and they also took our blood. After 40 days here, they gave us six more vaccines and said they were vitamins and other things to prevent illness. I have also been given eye drops because my eye is red and irritated. I also have leg pain from a previous injury and they have given me a wrap to use to wrap my leg.
6. I would like to leave here to be with my uncle, J [REDACTED] who lives in Atlanta. He is married and has a wife and four children. I know him well because we used to live close to each other in Guatemala. We have a good relationship. He would like me to be released to live with him. My social worker told me that they are waiting to receive digital fingerprints from my uncle. However, I spoke to my uncle and he said he sent in his fingerprints 30 days ago. I know another person who has been held here for 100 days, and in his case it took about 70 days for the digital fingerprints to arrive. I also have an adult cousin named [REDACTED] who also lives in Atlanta with my uncle. I haven't been able to get information from my social worker for 20 days, because my old social worker left and when I called the new social worker, she didn't answer. I will keep calling. No one has told me when I will get to leave here. I'd like to leave here to be with my uncle, and to study. My parents want me to live with him. My parents gave permission, and my social worker spoke with my mother and she gave permission to the

social worker to release me to my uncle. After waiting for so long, I feel hopeless and sad because I haven't seen my family in so long.

7. I can't leave this facility. People who try to escape are always caught, and my friends tell me that if you are caught, you get sent to another place. The adults here have told us if we try to escape, we will be sent to a place with more laws where it would be harder to escape. However, it is already hard to escape. There are gates and walls that surround this place. You can only leave the buildings in a group, with permission, to do recreation in the yard. However, you aren't allowed to go outside the walls. You have to ask permission from the supervisors with the red hats to go get water, and you have to get permission from the YCs to use the bathroom.
8. I don't have an attorney. A counselor told me I could look for a lawyer once I am released from here.
9. I don't know if my family was asked permission by ORR to send me to this detention facility, or the other facilities where I have been held. My family didn't know I was here until I called them the day after I arrived here, and they were surprised.
10. We are only allowed to talk to our families by phone twice a week, for ten minutes. I speak for five minutes with my mother, and five minutes with my uncle. If I had more time, I could ask my mother how she is, and tell her what's happening here. I wish I could talk to her more to get support. I feel bad not being able to talk to my uncle. I would like to ask him if he knows what's happening with my case, and to know how he's doing, but there isn't time.

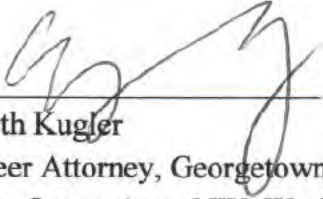
I, C [REDACTED] M [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

C [REDACTED] M [REDACTED]

8-01-18
Date

Certificate of Translation

I, Elizabeth Kugler, certify that I am fluent in English and Spanish and that I read the above declaration to
C [REDACTED] M [REDACTED] in Spanish. Executed this 1st of August in Homestead, CA.



Elizabeth Kugler
Volunteer Attorney, Georgetown Law
600 New Jersey Ave., NW, Washington, DC 20001

Exhibit 16

Declaration of

C [REDACTED] A [REDACTED] A NUMBER [REDACTED]

I, C [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. In part, I left because I was targeted by gang members who beat me.
3. My father, [REDACTED] and I crossed the border in November 2016 and presented ourselves to immigration officials. We were detained together for 10 days, where we were interviewed and fingerprinted. My father and I were then taken to Naples, FL. We lived together until June 11, 2018. About 6 months ago, my 17-year-old cousin came to the U.S. to live with us. On June 11, 2018, immigration officials called us and told us that we needed to come to an appointment in Ft. Myers, FL. On Tuesday, June 12, 2018, before we had a chance to go, immigration officials came to our house and detained us. They took us to Ft. Myers and checked our fingerprints. Officials separated me from my father and my cousin and I stayed in a hotel in Naples, FL that night. On June 13, 2018, my cousin and I were brought to the Homestead Temporary Shelter for Unaccompanied Children.
4. On July 22, 2018, after 40 days of being in Homestead, they told me to pack my things because I was being transferred to see my sponsor, A [REDACTED] my pastor in Naples, FL who is a friend of my family. But this was a lie. Instead they took me on a plane to BCFS Texas Harlingen, a detention for children in Texas. I was confused as to why they were taking me on a plane, since my sponsor lives in Naples, FL. They told me I was going to be reunited with my father. I told them that this was not possible since he had already been deported. I knew this because my mom had told me over the phone. They took me anyway. When I arrived I told the officials again that my father had already been deported. I was only there for four days and then they brought me back. The conditions at that center were worse than in Homestead. They barely gave us any food, just salad and rice with beans. I was only given meat one time in the four days I was there, it was chicken. They would also wake us up in the morning and made one of the five of us who shared a room mop the floors before we could go eat breakfast.
5. On July 27, 2018, I was returned to the Homestead Temporary Shelter for Unaccompanied Children.
6. I have told the counselor and social worker at the center that I want to be released to A [REDACTED]. No one has confirmed to me that this will happen or when. My mom sent a power of attorney and my sponsor gave her fingerprints. I have spoken on the phone with my sponsor and she told me that they are asking her for more photos of us together. But we only have two. I am not sure what is going to happen. My cousin also wanted to be released to A [REDACTED] but the social worker told my cousin that he had only known my pastor for 5 or 6 months, and that was not enough to be released to her.
7. At this facility, I am not allowed to move around alone. I am always accompanied. The dorms do not have doors. Only the dining hall and the area where we make phone calls have doors and those are not locked. We have not been told what will happen if we try to leave the facility.

8. I have not spoken an immigration attorney. #27070

9. I am not aware that my parents signed a parental consent form for my transfer to Texas. I don't think my father signed because he had been deported to Guatemala on July 12, 2018.

10. I am given two calls a week. I have taken advantage of this each week since being here. Sometimes I have to use one of the two weekly calls to call my sponsor. We are only given 10 minutes for the call. If I talk longer than 10 minutes I am sometimes told my time is over. I wish I could talk to my parents for longer, 10 minutes is too little. I tell my parents how I am doing. I ask them when I can get out and if they have spoken to my sponsor.

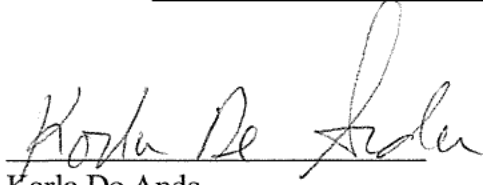
I, C [REDACTED] A [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
C [REDACTED] A [REDACTED]
08/01/2018

August 1, 2018

#27071
Certificate of Translation

I, Karla De Anda, certify that I am fluent in English and Spanish and that I read the above declaration to
C [REDACTED] A [REDACTED] in Spanish. Executed this 1st of August in Miami, Florida.

A handwritten signature in cursive script, reading "Karla De Anda", is written over a horizontal line.

Karla De Anda

Florida Legal Services, Inc.

122 E. Colonial Drive, Ste. 100

Orlando, FL, 32801

Exhibit 17

Declaration of
D [REDACTED] O [REDACTED] A number [REDACTED]

I, D [REDACTED] O [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. I was apprehended with my father and five other people. We were taken into custody by border patrol shortly after crossing into the United States somewhere in Texas on or about May 22, 2018. We were taken to a large house that had many people, perhaps as many as at Homestead. We slept on mattresses on the floor in one large room, with a thin gray nylon cover for sleeping.
3. After two days I was taken to Homestead, and have been here for 71 days.
4. My adult cousin, M [REDACTED] lives in Alabama, and is a legal resident of the United States. I would like to be released to him, and he has applied to allow me to be released to him. The staff at Homestead has not kept me informed on a regular basis of the status of that application. I spoke with M [REDACTED] recently, and he told me he is waiting for the staff at Homestead to send him the fingerprint card that is required for me to be able to live with my cousin.
5. I do now know whether the government sought my parents' permission before they sent me to Homestead.
6. I have needed to see a doctor just once since I came to Homestead. I had a stomach ache, and she gave me some medicine. The doctor did not ask my parents for permission or consent before giving me the medicine.
7. I am allowed to use the telephone for 10 minutes, twice a week, on Mondays and Wednesdays. I am allowed to speak on the phone only in the presence of the social worker. Since coming to Homestead I have talked often with my mother and father (who has since returned to Guatemala). But if we try to call my mother, and she does not answer, I have to wait until my next phone day to call.

I, D [REDACTED] O [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

D [REDACTED] O [REDACTED]

8/1/2018

Date

Certificate of Translation

I, Denisse C. Lamas, certify that I am fluent in English and Spanish and that I read the above declaration to
D [REDACTED] O [REDACTED] in Spanish. Executed this 1st of August, 2018 in Homestead, Florida.



8-1-18

Denisse C. Lamas
6900 S. Orange Blossom Trail
Suite 402
Orlando, FL 32809

Exhibit 18

Declaration of
E [REDACTED] G [REDACTED], A Number [REDACTED]

I, E [REDACTED] G [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from El Salvador.
2. When I lived in El Salvador, three friends introduced me by phone to a leader of MS-13. The leader told me I needed to join MS-13, and that if I didn't they would kill me. I told my father about this conversation. He and I agreed that we would not be safe from MS-13 in El Salvador. Thus, we decided to flee to the United States. Both my mother and my father have brothers who live in the United States legally in California.
3. I was apprehended with my father [REDACTED] We were taken into custody by border patrol shortly after crossing into the United States near San Diego, CA, on or about May 25, 2018. We were taken to Yelera de Sandiego, where I was separated from my father. The facility where I was held did not allow any light from outside. It was cold. We were given mattresses on the floor to sleep on, and thin covers for when we sleep. The material was green and scratchy.
4. After 8 days, another person who was being detained at Yelera told me that my father had been transferred to another facility. I was not told where. I asked the guards where my father was transferred, and they told me only that he had been transferred. On June 3, 2018 I was transferred to the facility where I am now, in Homestead, Florida. I was told that I was being sent to Homestead because, "they always send them here." When I arrived at Homestead, I was told I would be here for a month or less.
5. I have been here at Homestead since June 3, 2018.
6. I would like to live with my father's brother, J [REDACTED] who lives in the San Jose area of California, and is a legal resident of the United States. I understand that my uncle has submitted paperwork to allow me to live with him. At one point during my stay here a social worker told me that I would soon be able to leave Homestead. When time passed and I was not allowed to leave, I was reassigned to a different social worker. I was told by someone who works at Homestead that I would be reunited with my father on June 25 or 26. But that did not happen. Since then, I have not been told when I would be able to leave Homestead. And I have not been provided with an update on the status of any efforts to reunite me with my father, or to allow me to live with my uncle in California in more than 3 weeks.
7. I do not know whether the government sought consent from my father to transfer me to Homestead.
8. Since being here I have talked to my father twice. But I do not remember the last time I spoke with him. I am allowed 10 minutes of phone time, twice per week, which I use to speak with my mother and my uncle Jose.

I, E [REDACTED] G [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in English, a language in which I am not fluent, and was read back to me in Spanish.

E [REDACTED] G [REDACTED]

8/1/2018
Date

Certificate of Translation

I, Denisse C. Lamas, certify that I am fluent in English and Spanish and that I read the above declaration to E [REDACTED] G [REDACTED] in Spanish. Executed this 1st day of August, 2018 in Homestead, Florida.


8-1-18

Denisse C. Lamas
Hispanic Family Counseling
6900 S. Orange Blossom Trail
Suite 402
Orlando, FL 32822

Exhibit 19

Declaration of Heyvi Z [REDACTED]
H [REDACTED] Z [REDACTED] A NUMBER [REDACTED]

I, H [REDACTED] Z [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. I was contacted and taken into custody by Border Patrol shortly after crossing into the United States on or about June 1st, 2018. I don't know where we entered into the U.S. I was apprehended with my father and my cousin. However, when we were caught, my father was separated from us. My cousin D [REDACTED] is 16 and so we were detained and placed together with other young people who were between about 10 and 17 years old. The government agents asked me my name and asked for my papers, where I was from and what religion I was. I was not asked about asylum. We were taken to a facility by car and held for two days. While we were there, we also were not given access to sufficient food or beverages. We were only given juice twice a day and no other liquids. When we asked for something more to drink, the Border Patrol agents told us that we had to drink dirty wash water ("agua de chorro") if we wanted anything more to drink. We only had microwave ramen to eat, and the Border Patrol agents didn't cook it fully so it was hard to eat. I was very hungry and thirsty, especially at night. I also felt terrible because the Border Patrol agents said hurtful things, telling us we should have stayed in our countries. I knew my father was being held in the same facility, because I could see him through a glass wall that separated the adults from the children. Then I was taken from my cell. I begged to see my father before I left. At first the Border Patrol told me no, but finally someone let me see him. I only got to talk to him for about eight minutes. I was held there for two days, and we were not given a change of clothing until we left. My cousin D [REDACTED] experienced these conditions with me.
3. Then I was put in a car to be taken somewhere else, although no one told me where I was being taken. They drove me for four or five hours to Arizona – I figured out I was in Arizona because I saw a sign along the way. The people who transported me gave me food and water, and transported me to a house, where I stayed for one hour. Then the same people drove me to the airport. I still didn't know where I was being taken. My cousin D [REDACTED] was also transported at the same time.
4. I arrived at Homestead detention center on June 2, 2018. My cousin D [REDACTED] was also brought to Homestead at the same time. I have been here for 62 days.
5. I would like to be released to my adult cousin, E [REDACTED] who lives in Tennessee. My cousin D [REDACTED] who arrived at the same time as me, was released 20 days ago to live with E [REDACTED]. However, she was released 20 days ago, while I'm still here. I miss her a lot, because D [REDACTED] like a sister to me. I don't understand why D [REDACTED] was released when I was not. My social worker, [REDACTED] says that D [REDACTED] was released because she came alone, but I came with my father, and so it's more complicated for me to be released. My social worker also says she is waiting for an email from someone to provide permission for my case to continue and so I can leave. My parents have provided a letter of permission for me to live with my cousin E [REDACTED] and E [REDACTED] has agreed that I can be released to her. My social worker [REDACTED] told me about 20

days ago that my case was finished and that soon I would be able to leave – we just had to wait to get approval from the government. She had processed my case together with D [REDACTED] so I thought I would be able to leave together with D [REDACTED]. Then, about a week and a half ago, I was sent to talk to another social worker named [REDACTED] told me that my case was different, and that there was a court decision that would take place on July 26th, and afterwards I would probably be released. I thought I would be released on the 26th, but I wasn't. Then my other social worker told me that she hadn't heard anything, and my transfer still isn't approved. My mom is so worried about me and I feel so sad because I don't want her to worry but I don't know why I'm stuck here. I pray to God that I get to leave here. I feel so alone, especially now that my cousin D [REDACTED] has left and I am still here. It's hard to concentrate, and I often think, "not another day living here." I feel sad and hopeless because I don't know when I will be released or why I haven't been released.

6. We aren't allowed to leave the grounds of this facility – it's closed and gated. We are allowed to go outside of the buildings from about 6pm-6:30pm, but not to leave the grounds. There are strict rules for when we are supposed to be in bed, at school, and in every part of the campus here. We have to listen when we are told to go places and to follow the rules. The staff here have told us that if we don't listen or obey the rules, they will have to file a report and that this report will follow us. The YC's here say that they would have to file a report because they are following orders from their supervisors, and those are the orders they have been given. Yesterday, a boy tried to run away right in front of me, and the security guards chased him around the corner of a building, and then I saw them walking him back a little later. I could understand why he wanted to run away – we've been held here for so long. It feels like we are prisoners because we have been here for so much time.
7. I don't have a lawyer. I have not spoken to any legal counselor or been told about any legal rights.
8. I don't know if ORR asked for permission to me to be transferred. My parents have given permission for me to be released to my adult cousin, E [REDACTED]
9. I am only allowed to talk to my family twice a week, for ten minutes. However, sometimes it's less time because the staff tells us to hurry up and let other young people make phone calls. This week, I didn't get to call my mom because we had a fire drill during the time that was allocated for my call. I dearly wish I had more time to talk to my mom. I would love to talk to my mom for hours at a time. I want to know if she's ok, if she's sick, how my siblings and grandparents are doing. Getting to talk to my mom would help me feel better, and help me be patient with being stuck here and depressed. Right now, I don't have time to tell her anything about what's happening or about the conditions here. We just have a little bit of time to talk about whether I'll be released, and I'm just having to constantly tell her that I don't know when I'll be released.

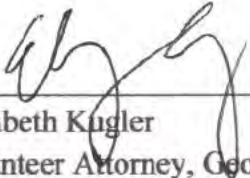
I, E [REDACTED] Z [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
H [REDACTED] Z [REDACTED]

68/01/18
August 1, 2018

Certificate of Translation

I, Elizabeth Kugler, certify that I am fluent in English and Spanish and that I read the above declaration to H [REDACTED] Z [REDACTED] in Spanish. Executed this 1 of August in Homestead, Florida.



Elizabeth Kugler
Volunteer Attorney, Georgetown Law
6711 Westmoreland Ave, Takoma Park, MD 20912

Exhibit 20

Declaration of
J [REDACTED] M [REDACTED], A NUMBER [REDACTED]

I, J [REDACTED] M [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Honduras.
2. **In part, I left Honduras because a gang targeted my family, and tried to kill my father.**
3. I was apprehended with my father, E [REDACTED] I think it was in June, but I am not sure. My father and I were separated by immigration officials. They didn't even give us a chance to say goodbye. Immigration lied to me and my dad. They told us I would only be separated from my dad just one day. A week after we were apprehended he was deported.
4. I spent the night of my apprehension in a place we called "la hielera" ("the ice box") in Texas, where there were many women sleeping in bunks or wherever they could find. I slept on the floor, wherever I could find room, with nothing but an aluminum blanket.
5. The next morning I was taken to a detention center we call "la perrera" ("the dog pound"), which is a detention center where they keep different populations in different "jaulas" ("cages") in Houston, Texas. I was given a blanket there. I spent four days there.
6. On June 15, I was brought to the Homestead Temporary Shelter for Unaccompanied Children. I do not remember the exact day. Here I have a room with a bed, and clothes. We are watched all day. The food is ok, but the breakfast dull and does not change. We have eggs every day. I don't like the rules here, they are very complicated. They make us stay in our beds whenever we are in the room. They won't let us sit on the ground or be anywhere else. I don't like this because I am sweaty after lunch and I don't want my bed to get dirty. They also do not give us enough time every day to get ready for bed. They turn off the lights even if you are still showering or getting ready. About 17 days ago, one of my friends fell and broke her arm when they turned off the lights while she was still showering. Another thing I don't like is that every morning they look through all of my things, because some of the girls have been hiding makeup and beauty products. I feel this is an invasion of my privacy.
7. I have been at the Homestead Temporary Shelter for Unaccompanied Children since June 15, 2018.
8. I wish to leave here, I have been here for very long. I have not been told when I will be released. My uncle, J [REDACTED], and my aunt, N [REDACTED] are going to be my sponsors. They live in Wisconsin. They both got their fingerprints done but the results have not come back. My dad signed a power of attorney. No one at this center has told me how long this process will take. No one has explained my options for release to me.
9. There is a lot of security here. Even to go to the bathroom, you need to go with someone ("the YC"). They say they have security guards surrounding the building. Even to go from the school to the cafeteria they have to scan your ID. They did not tell me what would happen if we tried to leave, but I believe if I try to leave I would be reported and it would have legal consequences. When I first arrived I was given

documents in Spanish that had phone numbers and what to do when you go to court. I was not given information on how to file a grievance.

10. I met with a legal assistant from Americans for Immigrant Justice.

11. I do not know if my father signed a parental consent form for my transfer.

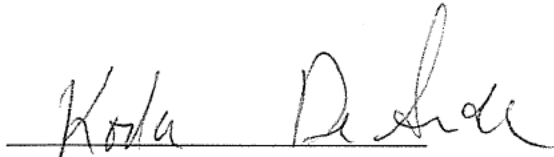
12. I am allowed to make phone calls two days a week. But we are only given 10 minutes. It's an injustice. I often don't have enough time to say everything. I would be happier even with 5 or 10 minutes more. It is also difficult because if I call my dad, then I don't have time to call my sponsors, and vice versa. I ask my dad how he is doing and I tell him I miss him.

I, J [REDACTED] M [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

August 1, 2018
August 1, 2018

#27085
Certificate of Translation

I, Karla De Anda, certify that I am fluent in English and Spanish and that I read the above declaration to J [REDACTED]
Ma [REDACTED] in Spanish. Executed this 1st of August in Miami, Florida.

A handwritten signature in cursive script, appearing to read 'Karla De Anda', is written over a horizontal line.

Karla De Anda

Florida Legal Services, Inc.

122 E. Colonial Drive, Ste. 100

Orlando, FL, 32801

Exhibit 21

Declaration of
J [REDACTED] A NUMBER _____

I, J [REDACTED] A [REDACTED] (A number _____), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from POTRERILLOS CORTES, HONDURAS. I was raised by my mother V [REDACTED] My father lives in the U.S. in Wilmington, NC, and I have not seen him or met him.
2. I left my town in Honduras because my mother was afraid that my older brother and I would be killed by a gang due to trouble at our school. Our dad lives in Wilmington, NC, and we were given permission by my mother to go and see him. My paternal grandfather provided us with an address of where my father resides in North Carolina. Our mom paid a coyote to bring my brother and me through Guatemala and Mexico, and then into the U.S. with the hope of finding our way to our Dad, so we could be safe.
3. My brother M [REDACTED] and I came alone with the Coyote. The coyote accompanied us all the way until we reached Mexico, and eventually directed us to walk towards Texas. We traveled for about three hours later where my brother Jose and I were stopped by border patrol. This was on July 27, 2018 and we arrived at this detention center In Homestead, FL on July 30, 2018.
4. I have been at this current facility for three days.
5. This facility is not secured, but I have been told that if I leave I will be reported and it will delay my eventual release.
6. I do not have a lawyer.
7. Since being here I have talked to my father one time for ten minutes. I had to share the ten minutes with my brother M [REDACTED] I want to talk to my Dad more.
8. I understand my Dad is ready, willing and able to take care of my brother and me, and that he is ready to come pick us up as soon as we are released.

I, J [REDACTED] A [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

J [REDACTED] A [REDACTED]

8/01/2018
Date

Certificate of Translation

I, MARSHA MENA, certify that I am fluent in English and Spanish and that I read the above declaration to JOSE A. [REDACTED] in Spanish. Executed this 1st of August in Homstead, FL.



MARSHA M. MENA
HISPANIC FAMILY COUNSELING
6900 S. ORANGE BLOSSOM TR.
ORLANDO, FL 32809

Exhibit 22

Declaration of
K [REDACTED] M [REDACTED] A NUMBER [REDACTED]

I, K [REDACTED] M [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. My father, [REDACTED] and I presented ourselves to immigration in May 2018. I do not remember the day. They separated us and took me to a place we called "la hielera" for about 10 hours. Then they took us both to a place we called "la perrera," but we were not kept in the same place. That was on a Monday. On Tuesday, they asked all of the children who had come with their parents to come with an officer. They gave us a chance to talk to our parents. That was the last time I saw him. I was only given around 10 minutes. I was at "la perrera" for four days.
3. On May 24, 2018, I was brought to Homestead Temporary Shelter for Unaccompanied Children. I have been there ever since.
4. The plan is for me to go with my cousin, A [REDACTED]. She did all of the paperwork and we are waiting for approval. My cousin and I were told that the government would let us know by July 26, 2018, whether I would be released to her. But that day passed, and I haven't heard anything.
5. When I arrived here they told us the rules. No one has told me what would happen if I tried to leave. The food is so-so. The people who watch me are women. There is one staff member in the morning, one in the afternoon, and one in the evening. The evening person stays outside the room. Whenever we are in the rooms we are not allowed to walk around, we have to stay in our beds. Yesterday someone came and searched our suitcases while we were gone. This was the first time it happened. I had yarn to make bracelets and they took it from me. Many others had things taken from them.
6. We are only given 15 minutes to eat. If you aren't done it doesn't matter. There are always people who haven't finished their meals because they weren't given enough time. We are given only 30 minutes of recreation a day. The rest of the time we are in school. I have one teacher who teaches me all of the subjects and she barely teaches us anything. She will just write things on the board and not explain them.
7. I wear whatever clothes they give me. They have t-shirts of many colors, but you can't choose and I was only given pink shirts. They took my own clothes and didn't give me my pants back. We are only given 5 minutes to shower each night and if we take longer the officers rush us.
8. I met with a legal assistant from Americans for Immigrant Justice.
9. I do not know if my father signed a parental consent form authorizing my transfer.
10. I get only two calls a week, only 10 minutes each call. I wish they gave me more time.

I, K [REDACTED] M [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in English, a language in which I am not fluent, and was read back to me in Spanish, a language in which I am fluent.

08/01/2018

August 1, 2018

K [REDACTED] M [REDACTED]

#27092
Certificate of Translation

I, Denisse C. Lamas, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] in Spanish. Executed this 1st of August in Miami, Florida.



8-1-18

Denisse C. Lamas, LCSW
Hispanic Family Counseling
318 N John Young Pkwy. Suite 6
Kissimmee, FL, 34741

Exhibit 23

Declaration of K [REDACTED] D [REDACTED]
A# [REDACTED]

I, K [REDACTED] D [REDACTED], (A# [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am a native of Huehuetenango, Municipality of Cuilco, Guatemala. I lived with both my father [REDACTED] and mother [REDACTED] in Guatemala.
2. I left Guatemala on May 17th, 2018. I came to the United States with my father. We traveled for about eight days with a large group of individuals through Mexico until we reached the U.S. border. I crossed the border with my father near a town called Mexicali. on or about May 24th, 2018. It was about 8pm when we crossed the border. A few minutes later, we were intercepted by the border patrol, were interviewed right there, and then we were taken by vehicle to a large detention place.
3. Upon our arrival to the detention center, the agents took away all of our belongings. We went inside where we were fingerprinted and I was separated from my father and put on a room with about 13 other boys. I was kept on this room for about two days and then transferred to another home. I asked the woman that was watching me if I could see my father and say goodbye to him but she said that there was no time. I asked her if I was going to see my father again and she said yes.
4. I was then transported for a few hours overnight to a home. It was a home that housed about 15 other children. I was fed and rested for about two hours, and then transported again to another home where I slept overnight. The next morning I was returned the clothes that had been taken away from me at the border and taken to the airport where they informed me they were transferring me once again to another home.
5. Upon landing at another airport in the evening, I was transported to the detention center in Miami where I am currently detained since May 26th, 2018. It was upon arriving to the center that I found out for the first time where I was. I have been on this center for 67 days.
6. The next morning I was given a medical examination, drawn blood from my left arm and given 9 vaccinations. For the next seven or eight days, I was not informed of anything regarding what was going to happen to me nor was I permitted to call my mother. I kept asking the persons watching me what was going to happen but they kept saying they didn't know, that I was gonna be able to speak to someone later about that.
7. About eight days after arriving to Miami, I was finally taken to meet my case manager and counselor. They told me that I was going to be going to school while they found my family members. They asked me about how I had crossed and if I had any family members in the United States. They contacted my uncle B [REDACTED] who resides in Pennsylvania and asked him if he will be willing to sponsor me and he said yes. I asked them about my father's whereabouts but they informed me they had no idea where he was. I was then permitted to call

my mother in Guatemala and she spoke to the case manager and counselor. This was the first time my mother found out we had been apprehended and that I had been separated from my father. My mother told them she agreed to have my uncle B [REDACTED] take care of me so I could stay in the United States as she didn't want me to return to Guatemala with her.

8. After a month of having been brought to Miami, I found out that my father had been deported to Guatemala. I was able to speak to my father over the phone who told me that I needed to remain in the United States and that I was going to be sent to live with my uncle B [REDACTED]
9. I have been in contact with my uncle B [REDACTED] and he told me he has sent all the documents the government requested from him and that I was going to be reunited with him soon. However, it has been over three weeks since my case manager told me I was going to be released to my uncle and it has not happened yet.
10. Last week, my case manager said that while my uncle had already been approved to be my sponsor, they did not know what was going to happen to me right now because my case is stopped right now. She also said that they were going to do a blood test to me and my father to confirm that he is my father.
11. In the mean time, as I wait for news I remain here in Miami without knowing what is going to happen to me. My parents don't know either.
12. I have been able to call my family twice per week, for about 10 minutes. However, there have been times where I am not permitted to speak more than five minutes or sometimes I am rushed to hang up because they need to take me back to my room or because the case manager needs the phone.

I, K [REDACTED] D [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

K [REDACTED] D [REDACTED]

08/01/2018
Date

Certificate of Translation

I, Victoria Mesa-Estrada, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] in Spanish. Executed this 31st of July, 2018, in Miami, Florida.

Victoria Mesa-Estrada

Date: 08/01/2018

Victoria Mesa-Estrada
Florida Legal Services, Inc.
1880 N. Congress Ave. Suite 205
Boynton Beach, FL 33426

Exhibit 24

Declaration of
M [REDACTED] G [REDACTED] A NUMBER [REDACTED]

I, M [REDACTED] G [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Mexico.
2. I was apprehended by myself at the border. I don't remember what month it was. At that moment I had fallen on the ground and one of the CBP officers put his foot over me and said: "Do you want to run?"
3. I was taken to a place we called "la hielera." I was there for 9 hours.
4. Then they took me to a place we called "la perrera." I was there for four days. I was only allowed to shower once during those four days. Both breakfast and dinner consisted of a rice and beans burrito and milk. They didn't give us lunch, only some cookies and a juice around noon.
5. Then they brought me to the Homestead Temporary Shelter for Unaccompanied Children, where I have been for about 43 days.
6. I don't think they give enough food here. I leave every meal feeling hungry. I also don't think the eggs are real, I think they are powder.
7. Recently, the officers did a search of my room while we were gone. We came back from class and everything was in disarray. They took some cookies I had been saving. Many of us have to save snacks because we get hungry in between meals.
8. One of the officers, named J [REDACTED] is always mad at us. One time he told us to get off of the boxes we use to store our belongings saying: "None of you have enough money to pay for it if you break it."
9. They only give us two calls a week, for 10 minutes each. It is not enough for me. I have asked if I can have at least one more call a week, and they told me that two is already a lot. It is almost like being in a prison. All that's missing is the cells.
10. In the beginning of July, I was segregated, isolated, and kept alone in an empty room for 24 hours a day, for 8 consecutive days. The day they put me in there, I had told a "YC" that I wanted to go home. He took me to the medical unit and I waited there for 15 minutes. Then the same "YC" took me to an empty room downstairs that had 12 bunks. I think these are the rooms they use for the kids who are sick. He told me that I had to wait in that room until I got to go back to my country. At that time, I had not signed a voluntary departure.
11. During the 8 days that I was trapped in the room alone, there was a "YC" constantly sitting outside the room, watching me. I ate all of my meals there. I was not allowed to leave for any reason, not even to drink water. I did not go to school for those 8 days. I did not go to recreation for those 8 days. They even

brought the phone to me. I was all alone and no one would speak to me, except sometimes the "YC" would say a few words to me.

12. I told every "YC" and supervisor that I saw during those days that I wanted to leave. They all responded that they couldn't do anything about it and that they didn't know why I was there. I once saw a nurse in the hallway and asked her to help me. She told me this might be the process for people who are leaving to go back to their country.
13. I cried every day because I didn't want to be there. I felt so alone that I was even losing my appetite. I didn't leave the bed. I didn't have anything to do. At one point they brought me Monopoly, but I couldn't play alone. On the 6th day they brought me a television.
14. On the 7th day, I didn't want to eat my dinner and they offered to take me to the doctor. But I wasn't sick, so I didn't want to see a doctor. The supervisor came to see me and said he would see what he could do and took a picture of my badge.
15. On the 8th day around 3 p.m. I was let out. A woman and [REDACTED] came and told me they would let me out if I behaved. But I had not done anything wrong. I have never been reported for any misbehavior here at the shelter, and I have no criminal history here or in my country. I was never told why I was put in there. When I got out and first saw the sun it felt amazing.
16. My mom told me that she called the detention center's manager and they didn't give her an explanation for why I was kept alone and isolated for 8 days.
17. I celebrated my 16th birthday this past [REDACTED] All I did was cry.
18. My manager asked me if I had a sponsor, but I could not find one. I signed a voluntary departure three weeks ago because my mom is sick, and I am missing too much school. I just want to go home as soon as possible.
19. I have met with staff from Americans for Immigrant Justice.
20. As far as I know, my mom has never been contacted by the detention center, only to ask for my birth certificate.

I, M [REDACTED] G [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided by me in Spanish, a language in which I am fluent, and was read back to me in Spanish.

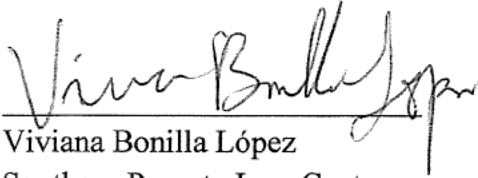
[REDACTED]

M [REDACTED] G [REDACTED]

Aug. 1. 2018
Date

#27100
Certificate of Translation

I, Viviana Bonilla López, certify that I am fluent in English and Spanish and that I read the above declaration to in M[REDACTED] G[REDACTED] Executed this 1st of August in Homestead, Florida.



Viviana Bonilla López
Southern Poverty Law Center
P.O. Box 370037
Miami, FL, 33137

Exhibit 25

Declaration of
Ma [REDACTED] Y [REDACTED] A Number [REDACTED]

I, Ma [REDACTED] Y [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Honduras.
2. I was apprehended with my father and about 20 other people. We were taken into custody by border patrol shortly after crossing into the United States near El Paso, Texas on or about May 23, 2018. We were taken to a yelera near El Paso where we were held for a day and half. We slept on the floor in a large room. It was cold and we asked for blankets. I heard one of the guards say that we should not be given blankets because we were new here, and we needed to tough it out. The guards asked two other teenage girls and me to take care of younger children at the yelera, because they had been separated from their parents. I cared for a 2-year-old and a 3-year-old child, one girl and one boy. When we were about to be transferred to another facility, I escaped from the guard so I could hug my father. That was the last time I saw him.
3. We were taken by bus to another facility, where I cared for the two children from the yelera, and a 1-year-old girl. We stayed at the second facility for two days, after which I was transferred to Homestead.
4. I have an adult cousin who lives in Michigan legally, O [REDACTED] to whom I would like to be released. He has applied for permission for me to live with him. According to the first case worker assigned to me, O [REDACTED] paperwork was all in order. But my current case worker (my third since coming to Homestead) recently told me that the fingerprints were not in the system. The staff at Homestead updated me yesterday on the current status. My father has since returned to Honduras.
5. I have been at Homestead since May 27, 2018
6. I have had to see the doctor at Homestead three different times. The doctor has given me medicine, but did not seek my parents' permission or consent first.
7. There are times here at Homestead when I have felt sad or depressed. I used to cry almost every day. I would talk with a clinician when I felt sad. But the staff at Homestead would not allow me to see her every time I felt I needed to.
8. In Honduras I used to attend church every day. At Homestead I can only attend on Saturday. I used to talk with my pastor in Honduras often. At Homestead, I am not allowed to talk with the pastor. I miss going to church.

9. I am concerned about staff at Homestead breaking the rules. For example, they often search our personal belongings, and even search our underwear.

I, M [REDACTED] Y [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
M [REDACTED] Y [REDACTED]

01/08/18
Date

Certificate of Translation

I, Denisse C. Lamas, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] Y [REDACTED] in Spanish. Executed this 1st day of August 2018 in Homestead, Florida.


8-1-18

Denisse C. Lamas
Hispanic Family Counseling
6900 S. Orange Blossom Trail
Suite 402
Orlando, FL 32809

Exhibit 26

Declaration of

M [REDACTED] A [REDACTED], A NUMBER [REDACTED]

I, M [REDACTED] A [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from POTRERILLOS CORTES, HONDURAS. I was raised by my mother [REDACTED]. My father lives in the U.S. in Wilmington, NC, and I have not seen him in about 12 years.
2. I left my town in Honduras because my mother was afraid that my younger brother and I would be killed by a gang due to trouble at our school. Our dad lives in Wilmington, NC, and we were given permission by my mother to go and see him. My paternal grandfather provided us with an address of where my father resides in North Carolina. Our mom paid a coyote to bring my brother and me through Guatemala and Mexico, and then into the U.S. with the hope of finding our way to our Dad, so we could be safe.
3. My brother Jose A [REDACTED] and I came alone with the Coyote. The coyote accompanied us all the way until we reached Mexico, and eventually directed us to walk towards Texas. We traveled for about three hours later where my brother Jose and I were stopped by border patrol. This was on July 27, 2018 and we arrived at this detention center in Homestead, FL on July 30, 2018.
4. I have been at this current facility for three days.
5. This facility is not secured, but I have been told that if I leave I will be reported and it will delay my eventual release.
6. I do not have a lawyer.
7. Since being here I have talked to my father one time for ten minutes. I had to share the ten minutes with my brother Jose. I want to talk to my Dad more.
8. I understand my Dad is ready, willing and able to take care of my brother and me, and that he is ready to come pick us up as soon as we are released.

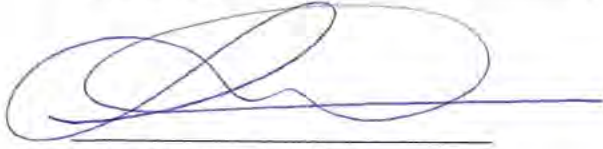
I, M [REDACTED] A [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
M [REDACTED] A [REDACTED]
8/01/2018

Date

Certificate of Translation

I, MARSHA MENA, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] A [REDACTED] in Spanish. Executed this 1st of August in Homstead, FL.



MARSHA M. MENA
HISPANIC FAMILY COUNSELING
6900 S. ORANGE BLOSSOM TR.
ORLANDO, FL 32809

Exhibit 27

Declaration of
M [REDACTED] G [REDACTED], A NUMBER [REDACTED]

I, M [REDACTED] G [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from COBAN, GUATEMALA. I came to the U.S with my father [REDACTED] I came to the U.S for, among other reasons, a chance for a better education.
2. I crossed the border from Mexico into Mcallen, Texas. We were traveling with a coyote, and with a friend of my father and his son. We crossed the border on May 24, 2018 and we were stopped by border patrol within 10 minutes.
3. After apprehension, I was with my father in a border facility for 2 days before my father was sent to another facility and later deported. I have not seen my father or any other family members since that day. Two days after I was separated from my father, I was put on a plane and eventually brought to this current facility where I have been detained for 73 days.
4. I have a cousin, V [REDACTED] who lives in Houston, Texas. I have spoken once with my cousin V [REDACTED] who is willing and able to care for me in his household. I have also spoken with both my mother and father in Guatemala and they approve of me living with my cousin V [REDACTED]
5. I am told by my social worker that my case has not yet been "open". My cousin V [REDACTED] tells me that he is only awaiting receipt of the paperwork in order to do whatever is necessary to have me released to him.
6. I understand that I am not allowed to leave this facility and I am told that if I attempt to leave or escape, I will be deported. I have also been told that I can request deportation back to Guatemala at any time, but that, if I hope to have the possibility of release to my cousin I must wait on the necessary paperwork. I am willing to wait as long as reasonably necessary to accomplish this because it is my strong desire to be released to my cousins care so that I can remain in the U.S
7. As far as I know, I do not have a lawyer.
8. As far as I know, no one at the facility where I am detained has sought parental consent for any transfer of me.
9. Since being here, I have spoken to both my parents about five times. I am allowed to call them twice a week for a duration of 10 minutes.
10. I am worried that I do not know my current status, or how much longer I will be at this facility, or where I will be sent next.

I, M [REDACTED] G [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

M [REDACTED] G [REDACTED]

08/07/18

Date

I, MARSHA M. MENA, certify that I am fluent in English and Spanish and that I read the above declaration to
M [REDACTED] G [REDACTED] in Spanish. Executed this 1st of August in Homstead, FL.

MARSHA M. MENA
HISPANIC FAMILY COUNSELING
6900 S. ORANGE BLOSSOM TR.
ORLANDO, FL 32809

Exhibit 28

Declaration of N. [REDACTED] G. [REDACTED]

A# [REDACTED]

I, N. [REDACTED] G. [REDACTED] (A# [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] am thirteen years old. I am a native of La Encarnacion, Municipality OF Ocotepeque, Honduras. I lived with my father [REDACTED], my step mother and my siblings. I don't have a mother as she died in 2006.
2. I do not have an attorney representing me in immigration.
3. I felt Honduras with my father on May 15th, 2018. It took us about one month to make it to the U.S. border. We crossed the border near McAllen, Texas. Upon crossing the river, we were immediately apprehended by the border patrol. My father and I were then taken to a station where we were separated upon arrival. I was put on cell with other children until the next day when I was momentarily reunited with my father as they transported us to another center called "La Perrera."
4. Upon arriving to la Perrera, I was separated from my father again. I was told by a guard that I was going to be reunited later on with my father; however, this was the last time I ever so my father.
5. I was placed on a huge cell that had approximately 200 boys. I remained on this place for about three and one half days. At this location, I was permitted to shower, was fed and was given a mat to sleep on the floor with an aluminum blanket. I was then taken to the airport and sent to Miami, where I have been since then. I believe I arrived to Miami on June 20th, 2018. I have been at this center for about 50 days.
6. After having been fed, and medically examined, I was permitted to shower and go to bed. The next day I was given vaccinations and permitted to rest for the rest of the day. About two days later, I met my counselor and case manager who told me that I could remain in the United States if my father permitted me to and that I could perhaps go a live with a family member if I had someone in the United States. I told them I had my aunt J. [REDACTED] who lived in Atlanta, Georgia but I did not have her phone number. Then, they called my family in Honduras and I was able to speak to my step mother who told me she didn't know the whereabouts of my father. She told me she would get me my aunt's information so we could call her.
7. About ten days later, I found out my father has been deported back to Honduras. I was able to speak to him and he told me he did not want me to return to Honduras. He told me that he wanted me to go and live with my aunt J. [REDACTED] in Atlanta.
8. My aunt has been working with my case manager and is trying to bring me to her home. I was told by my case manager that they first need to make sure that my aunt is really my family member before they can send me to her. I was told by my case manager that my aunt must get her finger prints done and then the government will decide if I could go with her.

9. To this day, I still don't know when will I be sent to my aunt's home. I am desperate right now and really want to leave this place and be home with my loved us. I am very sad and feel very lonely.

I, N [REDACTED] G [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

N [REDACTED] G [REDACTED]

8/1/2018

Date

Certificate of Translation

I, Victoria Mesa-Estrada, certify that I am fluent in English and Spanish and that I read the above declaration to N [REDACTED] G [REDACTED] in Spanish. Executed this 31st of July, 2018, in Miami, Florida.

Victoria Mesa-Estrada

Date: 8/1/2018

Victoria Mesa-Estrada
Florida Legal Services, Inc.
1880 N. Congress Ave. Suite 205
Boynton Beach, FL 33426

Exhibit 29

Declaration of N [REDACTED] JU [REDACTED]
A# [REDACTED]

I, N [REDACTED] JU [REDACTED] (A# [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am a native of Mataquescentla, Municipality of Jalapa, Guatemala. I lived with my grandmother [REDACTED] in Aldea Morales, Mataquescentla, Guatemala. My parents also lived in Guatemala but I did not reside with them since the age of 13 years old.
2. I came to the United States with my father [REDACTED] my step-mother [REDACTED] and my 3 month old- sister [REDACTED] We escaped Guatemala because our lives were in danger. My father operated a small restaurant in Aldea San Rafael, municipality of Santa Rosa, and was being extorted by the Mara Gangs in his locality. Despite my father having asked from protection from authorities to stop the extortion, nothing was done by us. On December 30th, 2017, my father was stabbed at least five times by the men who were extorting him, and he almost died. Because my father is diabetic, he was very delicate.
3. After my father was stabbed and in the process of recovering, he began getting threatening calls that they were going to kidnapped me and my family. The police didn't do anything to protect us. We decided to escape Guatemala and come to the United States and seek asylum.
4. I left Guatemala on or about May 22nd, 2018. We traveled for about one month and one half as we were apprehended in Mexico by Mexican authorities and deported back to Guatemala. We crossed through Mexico again for about five days and made it to the U.S. border crossing legally the border as we sought asylum at the point of entry in Texas.
5. Once we entered the border station escorted by the border patrol agents, I was immediately separated from my father. I was taken to a trailer with my step mother and little sister where I remained for about four days. My step-mother and baby sister were taken to another place one day after we arrived and I never saw them again. I asked several times to the men watching me where my father was and if I could be reunited with him but they would yell at me telling me to remain quiet, and saying that I didn't belong because the United States government didn't want Guatemalans, Hondurans or Salvadorans in the United States.
6. After four days on this trailer, I was awakening one day at about 3 in the morning. I was instructed to take a shower and change and that we were leaving to another place. I remember I was taken to a place called "la hielera" by other detainees where I was given a new set of clothes. Later, I was taken to a group home about 30 minutes away by car.
7. Once I arrive to this new facility, I noticed there were about fifty other children. Everyone slept in mats in the floor. I stayed there overnight where I was fed, and the next day I was taken to the airport.
8. Once on the plane, I was told that I was coming to Miami with at least 35 other children. I believe I arrived to Miami on June 14th, 2018 at around 4 in the morning. From the airport, I was

transported to the center in Homestead. When I first arrived to this center, I was given an orientation, was checked by the medical staff and given new clothes. I was also able to shower and then I went to sleep.

9. After three days of arrival in Homestead, I was interviewed by a woman [REDACTED] who asked me questions about my family, why I came to the U.S., my life style, and she also said that if I had any questions, I needed to speak to [REDACTED] who was going to be my counselor.
10. Three days later, I met my case manager [REDACTED] who explained to me he was going to be handling my case. He asked me if I wanted to return to Guatemala and I told him no. He asked me if I had any family members in the U.S. and I told him that my Aunt B [REDACTED] lived in Iowa; so A [REDACTED] called her and permitted me to speak to her. I called B [REDACTED] and she informed me she was expecting to hear from you and that she didn't know my father's whereabouts. However, she was already in contact with my step mother who was going to be sent to Iowa with her and my little baby sister. My aunt said she was willing to be my sponsor and told my social worker she could take care of me. After that, I was able to call my grandmother and my mother in Guatemala who also didn't know where my father was.
11. Two weeks after having arrived to Homestead, I was taken to see a woman who wanted to give me news about my father's whereabouts. She told me my father was at another detention center in Texas. I was permitted to speak to my father over the phone. When we spoke, my father told me about everything he had gone through since we were separated. He told me he was seeking asylum for all of us so we didn't have to go back to Guatemala. He said I couldn't return to Guatemala so he wanted me to go to live with my aunt B [REDACTED] until everything was resolved.
12. I have been able to speak to my father video camera and by phone a couple of times. My father to this day does not know what is going to happen to me and he doesn't know the reason why I have not been released to the care of my aunt.
13. On Sunday July 22nd, 2018, I was told by the center authorities here at Homestead that by order of the government, I was going to be reunited with my father so the next day I was going to be taken to see my father. Unfortunately, it wasn't until three days later that I was taken to the airport and flown to Houston, Texas. Once in Texas, I was taken to an office where they said my father would meet me. However, after waiting for over several hours, my father never arrived and the government took me to a home around 4 in the morning so I could sleep.
14. On Thursday July 26th, 2018, I remained at the home all day waiting to be taken to see my father. I went to sleep again and was awoken at about three in the morning on Friday and told to gather my things because I was going to be taken back to the shelter where I had been staying- meaning Homestead. I asked what had happened to my father and they told me they could not reunite us yet because there had been some complications with my father's flight so in the meantime, they needed to take me back to Miami.
15. I arrived to Miami once again on Friday July 27th, 2018 and had to go through the same procedure as the first time. It wasn't until August 1st, 2018 that I was finally taken to see my counselor and case manager to find out what had happened to my father and why I was not reunited like they had said. They explained that they were no longer handling my case and to this

day, I still haven't spoken to anyone to find out what is going to happen to me and when will I be reunited with my father. I haven't spoken to my father either and no one knows his whereabouts.

16. I am very sad and frustrated because I haven't been reunited with my family. I am very fearful for my father's life if he is sent back to Guatemala. I am also very worried for my father's health as he is diabetic and need to inject insulin to stay alive. I want to leave this center and be with my family soon. I hope I can remain in the United States and start a new life with my family.

I, N. [REDACTED] J. [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

N. [REDACTED] J. [REDACTED]

8/1/2018
Date

Certificate of Translation

I, Victoria Mesa-Estrada, certify that I am fluent in English and Spanish and that I read the above declaration to N. [REDACTED] J. [REDACTED] in Spanish. Executed this 31st of July, 2018, in Miami, Florida.

Victoria Mesa-Estrada

Victoria Mesa-Estrada
Florida Legal Services, Inc.
1880 N. Congress Ave. Suite 205
Boynton Beach, FL 33426

Date: 8/1/2018

Exhibit 30

Declaration of

D [REDACTED] A [REDACTED] A # [REDACTED]

I, D [REDACTED] A [REDACTED] A # [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. I left my home town of Peten, Guatemala with my father. Once we crossed the border in Texas, CBP arrested us within an hour. We were separated immediately, but it took 8 hours until I was told my father would be sent somewhere else to West Texas Detention Facility in Sierra Blanca, TX. From the CBP offices I went to a holding cell that I describe as being cold. And I was put in a room with ten others. I was there for one day.
3. The next day, I was transported by airplane to Homestead, Florida on May 23. Once I got here, it took 7 days before I got to see my case manager ([REDACTED]). It took another week before I was informed that Homestead tracked down my father, who was detained in Sierra Blanca, Texas. The next day, I was able to talk with him by phone (10 minutes). After that, I had to ask my case worker to set up a time to call my dad. The place where my father was detained would then set up a time for us to talk. It usually was scheduled for every two weeks and the call lasted for ten minutes each time.
4. I have an uncle, [REDACTED] who is my father's oldest brother. I was able to talk with my uncle and mother in Peten 7 days after arriving in Homestead. After that, I spoke with both of them twice a week for ten minutes.
5. Three weeks ago today, my father arrived back home in Peten. I'm not sure if he was asked to sign a voluntary document for departure.
6. Since his arrival back home, I have spoken with my father 4 different times. He felt shameful that we were separated, and was quite worried about what was happening to me in Homestead.
7. I was told by my dad that he was trying to get a family friend to agree to house me during my time in the U.S. That friend said he was willing to take care of me, but once the government sent him the paper work necessary for me to be released, my father was told the friend changed his mind. The friend was concerned about the legal requirements of guardianship.
8. My case manager informed me that I was going to have legal consultation as to what would happen to me next. On May 29, I was given a "Know Your Rights" presentation by Americans for Immigrant Justice. On May 31, I received a legal screening.
9. But I was never advised by the facility or CBP agents that I have the right to call my country's consulate. Rather, they are the ones that came to my current facility around two months ago, and that's when they met with me.

10. Right now, I miss my mom. She is sick in the hospital and I want to go home. Twenty days ago, I informed my case manager that I was willing to leave the U.S. voluntarily. But I was told, you have to speak with the legal department. They are the ones who told me the process for me to return home will not be quick and I may be in Homestead, FL for an undisclosed amount time. It's hard for me to understand what is preventing me from joining my family. Meantime, my mother's illness may get worse.

11. I have yet to see an immigration judge.

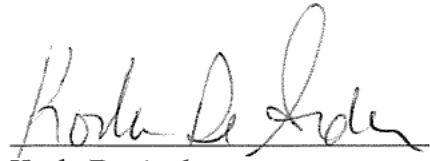
I, D [REDACTED] A [REDACTED] A # [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
D [REDACTED] A [REDACTED]

Julio 31 2018
July 31, 2018

^{#27120}
Certificate of Translation

I, Karla De Anda, certify that I am fluent in English and Spanish and that I read the above declaration to, D [REDACTED]
A [REDACTED] in Spanish. Executed this 31th day of July in Homestead, Florida.



Karla De Anda
Florida Legal Services
122 E. Colonial Drive, Ste. 100
Orlando, Florida 32801

Exhibit 31

**Declaration of O [REDACTED] D [REDACTED]
A# [REDACTED]**

I, O [REDACTED] D [REDACTED], (A# [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am fifteen years old. I am from the municipality of Playa Grande, Guatemala. I used to live with my parents [REDACTED] and [REDACTED] and my older sister before coming to the United States.
2. I do not have an attorney representing me in immigration.
3. I left Guatemala with my father to come to the United States on May 10th, 2018. We traveled for about 12 days before we arrived to the U.S. border. On May 22nd, 2018, we showed up at the El Paso, Texas Point of entry and sought asylum. We were immediately taken by vehicle to a facility to be interviewed. Once we arrived there, I was separated from my father and put in a cell with other minors. I remained in this place for about one day.
4. A day later, I was told I was being taken to another place. I asked if my father was coming and they said they didn't know. I was not permitted to say goodbye to my father. I have not seen my father since this day.
5. I was taken to an airport and traveled by air first to Houston, and then to Miami. I arrived to Miami in the afternoon of May 24th, 2018. I was given an orientation, fed, clothed and I was examined by a doctor who gave me vaccine shots. Then I went to shower and went to sleep.
6. The next day, I was taken to see my case manager and counselor and they told me they didn't know where my father was. I was told they were going to help me with my case and I was able to call my mother in Guatemala. My mother spoke to me and she told me she didn't know what had happened to my father. She had not heard from him yet.
7. During my first conversation with my case manager, she asked me if I wanted to return to Guatemala and I said no. She asked me if I had any family member in the United States and I told her that my cousin R [REDACTED] lived in the U.S. but I didn't know where and I didn't have his contact info. So my case manager said I needed to find another sponsor to help me. I later told my case manager that my brother in law J [REDACTED] also lived in the U.S. and he resided in Texas but I did not have his contact information either.
8. About two weeks later, someone came to see me and she told me that she was gonna let me speak to my father over the phone. I spoke to my father and he told me he was still in Texas and didn't know what was his future. My father told me I couldn't return to Guatemala and that he wanted me to stay in the U.S. with my cousin R [REDACTED]. Unfortunately, my cousin R [REDACTED] later said he couldn't take care of me.
9. On or about July 3rd, 2018, I called my mother and found out that my father had already been deported to Guatemala. I spoke to my father and he told me he did not want me to return to Guatemala with him and that I needed to remain in the U.S.

10. To this day, I still don't know what is going to happen to me as I have not spoken to my case manager for over two weeks. My counselor has continued to see me but she doesn't have any information about my case. I spoke to my father yesterday, and he told me he is trying to get my brother in law to be my sponsor but he doesn't know if and when I will be sent to be with him.
11. I really want to leave this place and find out more about my case. I don't know anything about what will happen to me. I am very sad and scared. I don't understand why I am not given any information as to what is going to happen to me.

I, O [REDACTED] D [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

O [REDACTED] D [REDACTED]

08/01/2018
Date

Certificate of Translation

I, Victoria Mesa-Estrada, certify that I am fluent in English and Spanish and that I read the above declaration to O [REDACTED] D [REDACTED] in Spanish. Executed this 31st of July, 2018, in Miami, Florida.

Victoria Mesa-Estrada

Date: 08/01/2018

Victoria Mesa-Estrada

Florida Legal Services, Inc.

1880 N. Congress Ave. Suite 205

Boynton Beach, FL 33426

Exhibit 32

Declaration of
S [REDACTED] D [REDACTED] A NUMBER [REDACTED]

I, S [REDACTED] D [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from SANSUR PALENCIA, GUATEMALA.
2. I came to the U.S with my father [REDACTED] approximately 2 months ago.
At my request my mother and father agreed that I could come to the US, in order to get a better education to fulfill my hope of becoming a teacher of physical education. I completed the 6th grade in Guatemala, but my father could not afford further education for me. In part, because, of his obligation to take care of his brother, my uncle who has a crippling injury. For my security, my dad agreed to accompany me to the US, and my mother agreed to the plan.
3. We traveled by bus through Mexico. At some point the bus stopped and we were directed to get out and walk across a dry riverbed. My father and I did so, and were detained by border patrol within a few minutes.
4. My father and I were together in the same facility for several days. I was then told that I would be separated from my dad. We were put on a bus and traveled a-ways. The bus stopped and my dad among other adults were told to get off. I had a brief opportunity to say goodbye to my dad and he told me we would be reunited. I believed him. I was then taken to a second facility and later to this present facility where I have been detained for one month and twenty-two days.
5. My aunt E [REDACTED], her husband and her children, live in Miami, FL. They are willing and able to have me join them in their household. My parents also agree also to this plan. I understand that paperwork has been sent, or is being sent at around this time to my aunt for this purpose.
6. I do not have an attorney
7. I understand that my social worker has spoken to my parents and has obtained their consent for my transfer to my aunt's custody.
8. I am allowed to talk to my parents twice a week for ten minutes each time.

I, S [REDACTED] D [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
S [REDACTED] D [REDACTED]

8/01/18
Date

Certificate of Translation

I, MARSHA M. MENA, certify that I am fluent in English and Spanish and that I read the above declaration to S [REDACTED] D [REDACTED] in Spanish. Executed this 1st of August in Homstead, FL.

A handwritten signature in black ink, appearing to read 'MARSHA M. MENA', written over a horizontal line.

MARSHA M. MENA
HISPANIC FAMILY COUNSELING
6900 S. ORANGE BLOSSOM TR.
Suite 402
ORLANDO, FL 32809

Exhibit 33

Declaration of

S [REDACTED] G [REDACTED] A NUMBER [REDACTED]

I, S [REDACTED] G [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. **I came to the United States, in part, because I was targeted by a gang member who threatened to kill me.**
3. I was apprehended with my father, [REDACTED] in mid-May at the border. I do not remember the exact date. They took us to a detention center, but I am not familiar with the name. I spent one day there, but I did not stay overnight. My father and I were kept in different rooms there. I was only given crackers and a juice that tasted like medicine.
4. Hours later my father and I were moved to another place. At this second place, parents were separated by gender and children were separated from both of the parents. My father was taken away the next day. Shortly after, he was deported. We were not allowed to say goodbye. I woke up and my father was no longer there. I was at this second location for two days. All I was given to eat was bread with a frozen piece of ham and the same juice that tasted like medicine. I was only there overnight.
5. The next place I was taken to is called "la hielera" by the people who stay there. I was there for 3 days. The meals there consisted of a little bit of water, milk, an apple, and a tortilla with beans. The place reminded me of the cages where you keep chickens. We were often cold because all they gave us was a thin aluminum blanket.
6. On May 22, 2018, I was brought to Homestead Temporary Shelter for Unaccompanied Children. I have been here since then.
7. In the mornings we are only ever given eggs for breakfast. I wish there was more variety. We only get 15 minutes for our dinner and often people are not able to finish their meals. I have not been able to finish my meal at least 3 times.
8. Whenever we are in the rooms we all have to sit in our own bed and the officers do not even let us get up to go to the bathroom. We have to ask for permission. This happens for 2 hours before bed every day. They turn off the light at 10 p.m. every night, even if you are not done getting ready. One girl fell and broke her arm when they turned off the light while she was still showering. We also only get 5 minutes to shower. If you go over the officers rush you.
9. I go to school here every day. We are mostly taught English and barely any other subjects. My favorite class is math but here we are only taught math for 7 minutes every day. I wish they taught me math for longer. Sometimes the teacher speaks to us only in English and we can't understand her.
10. One time the officers searched everyone's belongings looking for food, nail clippers, pencils, or erasers. They confiscated those things. The search happened while we were all gone.

11. We only get 20 minutes of recreation each day. I wish they gave us more time.
12. We are given all of the clothing we wear. I do not like it because it's too big on me.
13. My cousin, A [REDACTED] will be my sponsor. We are waiting for the government to approve this placement.
14. I have spoken to an attorney at Americans for Immigrant Justice.
15. I am not aware of my father being asked for parental consent when I was moved from one detention center to another.
16. I am only given two phone calls a week, each for 10 minutes. One time I was still talking to my mom and went a bit over and was told I had to hang up. I wish I had more time, sometimes even 15 or 20 more seconds. My parents give me advice and tell me to have faith.

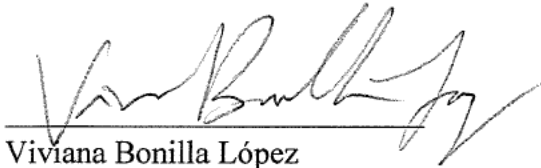
I, S [REDACTED] C [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

S [REDACTED] G [REDACTED]

Aug. 1. 2018
August 1, 2018

Certificate of Translation

I, Viviana Bonilla López, certify that I am fluent in English and Spanish and that I read the above declaration to in S [REDACTED] G [REDACTED] Executed this 1st of August in Homestead, Florida.



Viviana Bonilla López
Southern Poverty Law Center
P.O. Box 370037
Miami, FL, 33137

Exhibit 34

Declaration of

C [REDACTED] A [REDACTED] A NUMBER [REDACTED]

I, C [REDACTED] A [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. In part, I left because I was targeted by gang members who beat me.
3. My father, [REDACTED] and I crossed the border in November 2016 and presented ourselves to immigration officials. We were detained together for 10 days, where we were interviewed and fingerprinted. My father and I were then taken to Naples, FL. We lived together until June 11, 2018. About 6 months ago, my 17-year-old cousin came to the U.S. to live with us. On June 11, 2018, immigration officials called us and told us that we needed to come to an appointment in Ft. Myers, FL. On Tuesday, June 12, 2018, before we had a chance to go, immigration officials came to our house and detained us. They took us to Ft. Myers and checked our fingerprints. Officials separated me from my father and my cousin and I stayed in a hotel in Naples, FL that night. On June 13, 2018, my cousin and I were brought to the Homestead Temporary Shelter for Unaccompanied Children.
4. On July 22, 2018, after 40 days of being in Homestead, they told me to pack my things because I was being transferred to see my sponsor, A [REDACTED] my pastor in Naples, FL who is a friend of my family. But this was a lie. Instead they took me on a plane to BCFS Texas Harlingen, a detention for children in Texas. I was confused as to why they were taking me on a plane, since my sponsor lives in Naples, FL. They told me I was going to be reunited with my father. I told them that this was not possible since he had already been deported. I knew this because my mom had told me over the phone. They took me anyway. When I arrived I told the officials again that my father had already been deported. I was only there for four days and then they brought me back. The conditions at that center were worse than in Homestead. They barely gave us any food, just salad and rice with beans. I was only given meat one time in the four days I was there, it was chicken. They would also wake us up in the morning and made one of the five of us who shared a room mop the floors before we could go eat breakfast.
5. On July 27, 2018, I was returned to the Homestead Temporary Shelter for Unaccompanied Children.
6. I have told the counselor and social worker at the center that I want to be released to A [REDACTED]. No one has confirmed to me that this will happen or when. My mom sent a power of attorney and my sponsor gave her fingerprints. I have spoken on the phone with my sponsor and she told me that they are asking her for more photos of us together. But we only have two. I am not sure what is going to happen. My cousin also wanted to be released to A [REDACTED] but the social worker told my cousin that he had only known my pastor for 5 or 6 months, and that was not enough to be released to her.
7. At this facility, I am not allowed to move around alone. I am always accompanied. The dorms do not have doors. Only the dining hall and the area where we make phone calls have doors and those are not locked. We have not been told what will happen if we try to leave the facility.

8. I have not spoken an immigration attorney. #27133

9. I am not aware that my parents signed a parental consent form for my transfer to Texas. I don't think my father signed because he had been deported to Guatemala on July 12, 2018.

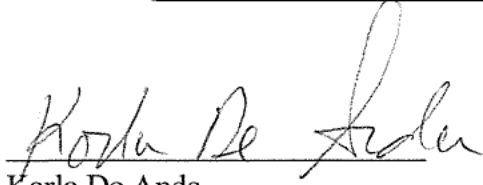
10. I am given two calls a week. I have taken advantage of this each week since being here. Sometimes I have to use one of the two weekly calls to call my sponsor. We are only given 10 minutes for the call. If I talk longer than 10 minutes I am sometimes told my time is over. I wish I could talk to my parents for longer, 10 minutes is too little. I tell my parents how I am doing. I ask them when I can get out and if they have spoken to my sponsor.

I, C [REDACTED] A [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
C [REDACTED] A [REDACTED]
08/01/2018
August 1, 2018

#27134
Certificate of Translation

I, Karla De Anda, certify that I am fluent in English and Spanish and that I read the above declaration to
C [REDACTED] A [REDACTED] in Spanish. Executed this 1st of August in Miami, Florida.

A handwritten signature in cursive script, appearing to read 'Karla De Anda', is written over a horizontal line.

Karla De Anda

Florida Legal Services, Inc.

122 E. Colonial Drive, Ste. 100

Orlando, FL, 32801

CERTIFICATE OF SERVICE

I, Peter Schey, declare and say as follows:

I am over the age of eighteen years of age and am a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state.

On this date, May 31, 2019, I electronically filed the following document(s):

- EXHIBITS IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE THE SETTLEMENT AGREEMENT [**REDACTED VERSION OF DOCUMENTS PROPOSED TO BE FILED UNDER SEAL**] VOL. 3 OF 5

with the United States District Court, Central District of California by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/Peter Schey
Attorney for Plaintiffs